

# **EXHIBIT A**

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# Moog's Trade Secret Identification is Sufficient Under the Transferor Court's Order and the Law Governing Early Discovery Identification of Trade Secrets

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## Skryse itself conceded that Moog is not required to identify source code line-by-line

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Moog also argues that providing a narrative response “would require Moog to list each and every line of code from the tens of thousands of source code files.” (Opp. at 4.) Interrogatory No. 1 requires no such thing. It asks Moog to identify its trade secrets, not “every single line of non-public source code.” (*Id.* at 10.) Moog cannot seriously contend that “each and every line” of its

Citation from Skryse’s Reply in Support of its Motion to Compel before Judge McCarthy

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*WeRide Corp. v. Kun Huang*  
379 F. Supp. 3d 834 (N.D. Cal. 2019)

- The defendant, like Skyrise, argued that “when the alleged trade secret is source code, the plaintiff must identify the specific code.” The court held that “this argument is wrong on the law.” *Id.* at 846.
- “WeRide is not required to identify the specific source code to meet the reasonable particularity standard.” *Id.*
- The court found the identification sufficient where “WeRide describes the functionality of each trade secret” and “names numerous files in its code base . . . that reflect the source code specific to each trade secret.”

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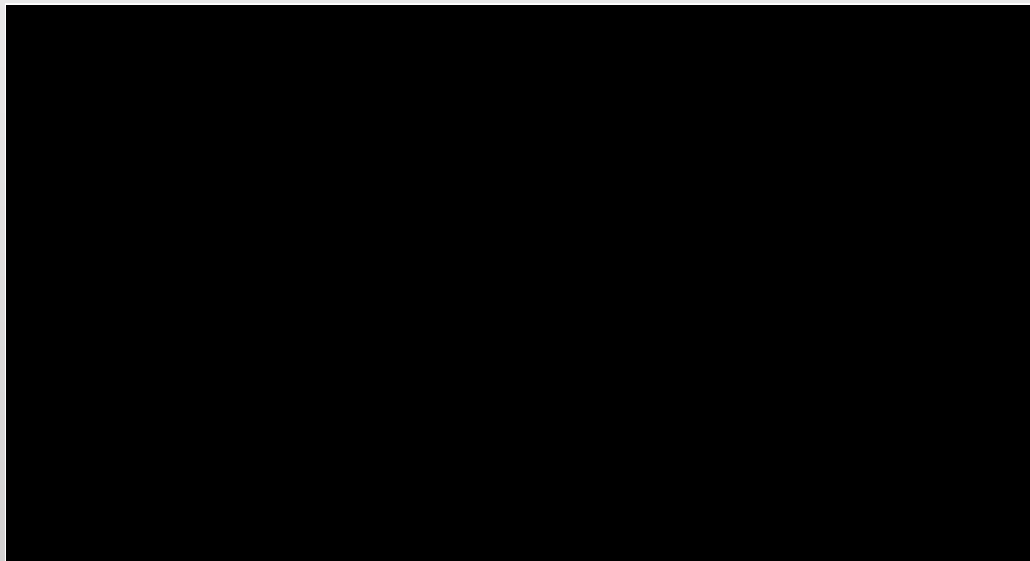
*WeRide Corp. v. Kun Huang*  
379 F. Supp. 3d 834 (N.D. Cal. 2019)

WeRide's Trade Secret Identification  
(Naqvi Decl. Ex. 2)

|    |                            |
|----|----------------------------|
| 16 | Trade Secret 9: [REDACTED] |
| 17 | [REDACTED]                 |
| 18 | [REDACTED]                 |
| 19 | [REDACTED]                 |
| 20 | [REDACTED]                 |
| 21 | [REDACTED]                 |

While WeRide's description for Trade Secret 9 is fully redacted in the publicly available identification, its narrative description is less than six lines, followed by a list of file names

Moog's Non-CUI Trade Secret Identification  
(Storey Decl. Ex. D)



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*WeRide Corp. v. Kun Huang*  
379 F. Supp. 3d 834 (N.D. Cal. 2019)

The most descriptive of Moog's identifications are of substantially more detail than WeRide's most descriptive identifications.

WeRide's Trade Secret Identification: Trade Secret 1 (Naqvi Decl. Ex. 2)

9 Trade Section 1: WeRide's Implementation of Sensor Fusion-Based Localization. As  
10 described above, a key component of "perception" is "localization," which means that the autonomous  
11 vehicle must know where it is currently located. The autonomous vehicle's computer accomplishes  
12 localization (i.e. determines the vehicle's current location) by examining inputs from various sensors  
13 installed on the vehicle. [REDACTED]  
14 Certain sensors may be less reliable in certain circumstances (i.e. cameras may be less reliable in the  
15 dark), while other sensors may provide limited information based on how they are mounted on the  
16 vehicle (i.e. a radar mounted on the front of the vehicle will provide different information than a radar  
17 mounted on the side of the vehicle). Making sense of the mixture of inputs from these various  
18 sensors, and accounting for the sensors' locations, strengths, and weaknesses, is a process referred to  
19 as "sensor-fusion" (because the inputs are "fused" together into a single data stream).  
20 Sensor-fusion is a necessary component of localization, because the vehicle must fuse the data  
21 from its various sensors in order to determine its current location. However, individual  
22 implementations of sensor-fusion, if derived independently, should differ between autonomous car  
23 developers, because sensor-fusion is based on multiple, independent choices. For example there is no  
24 single required set of sensors that must be used—different developers may choose to use cameras and  
1 radar and LIDAR, or just cameras and LIDAR, or even just LIDAR, and the developer's  
2 implementation of sensor fusion will be based on this choice of sensors. Likewise, even after sensors  
3 are chosen, the brand and configuration of sensors—more choices made by the developer—also  
4 determines the kinds of data collected, and again will impact sensor-fusion. Finally, even if  
5

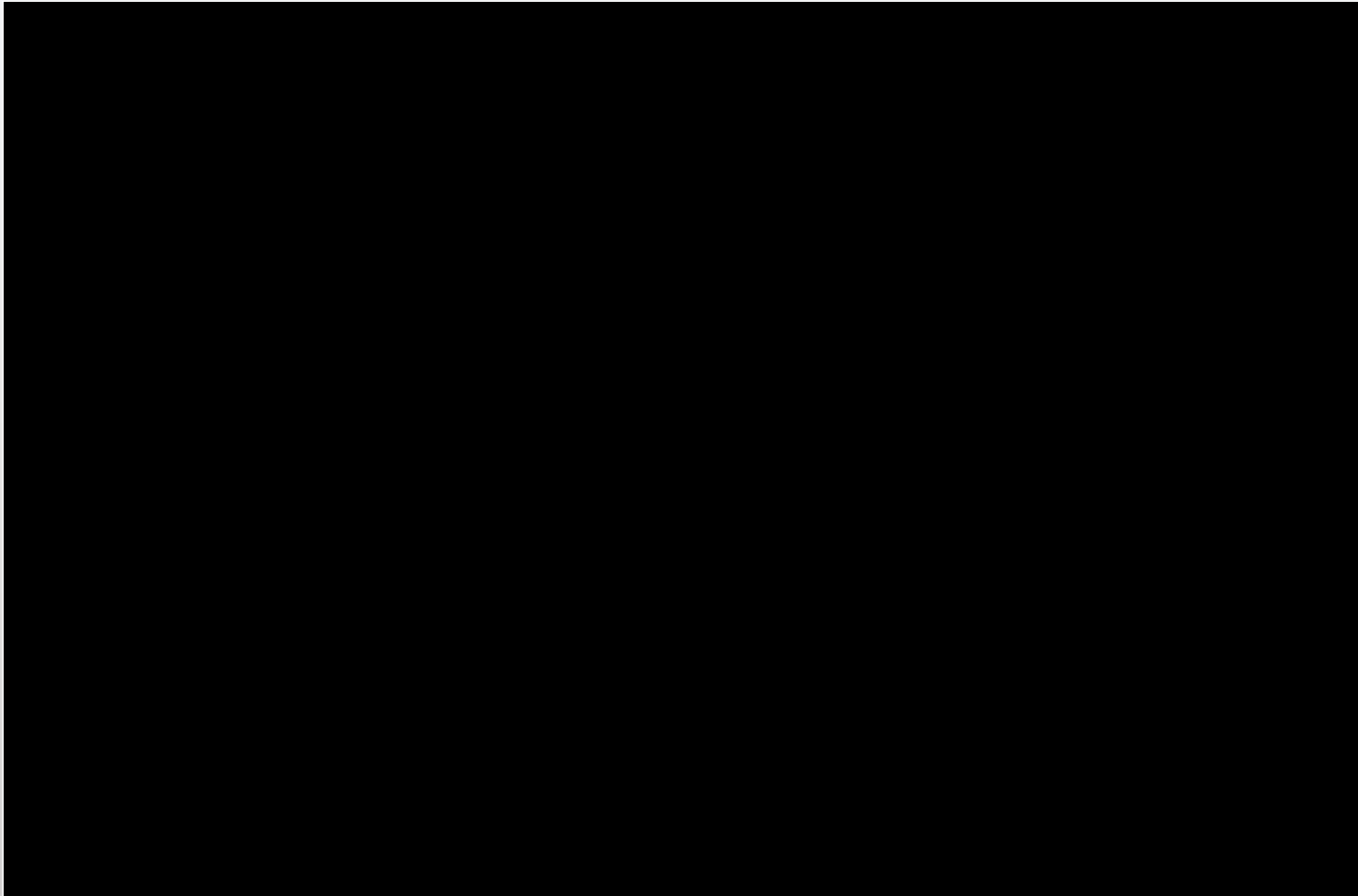
6 developers (improbably) independently elected to use identical sensors configured in an identical  
7 manner, the sensor-fusion code should still differ according to the goals of the autonomous vehicle  
8 developer and the overall design of the autonomous vehicle program; for example, different prediction  
9 modules (which exists separately from the sensor-fusion code) will respond differently to the same  
10 sensor-fusion code, and thus differences in the overall code base should be reflected in differences in  
11 the sensor-fusion code (again, unless the entire code base was stolen wholesale).  
12 WeRide is not—and does not claim to be—the inventor of the concepts of localization or  
13 sensor-fusion. However, WeRide is the creator of—and claims as a trade secret—the unique  
14 implementation of sensor fusion localization found in WeRide's code, and used in WeRide's  
15 autonomous vehicles, which is comprised of [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 The code WeRide created to accomplish its unique implementation of sensor-fusion  
20 localization was developed using (i) the specific sensors that WeRide has chosen to mount on its  
21 autonomous vehicles, as well as the configuration of those sensors, and (ii) the data generated by  
22 WeRide's extensive autonomous vehicle testing, using a fleet of over 20 cars over a period of many  
23 months. Based on its own proprietary data and experimentation, WeRide has developed unique code  
24 to fuse the data from the sensors on its autonomous vehicles. This code is reflected in the following  
25 files that can be found in WeRide's code base:  
26 ■ [REDACTED]

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Moog's Non-CUI Trade Secret Identification: Trade Secret 7 (Excerpts)

(Storey Decl. Ex. D)

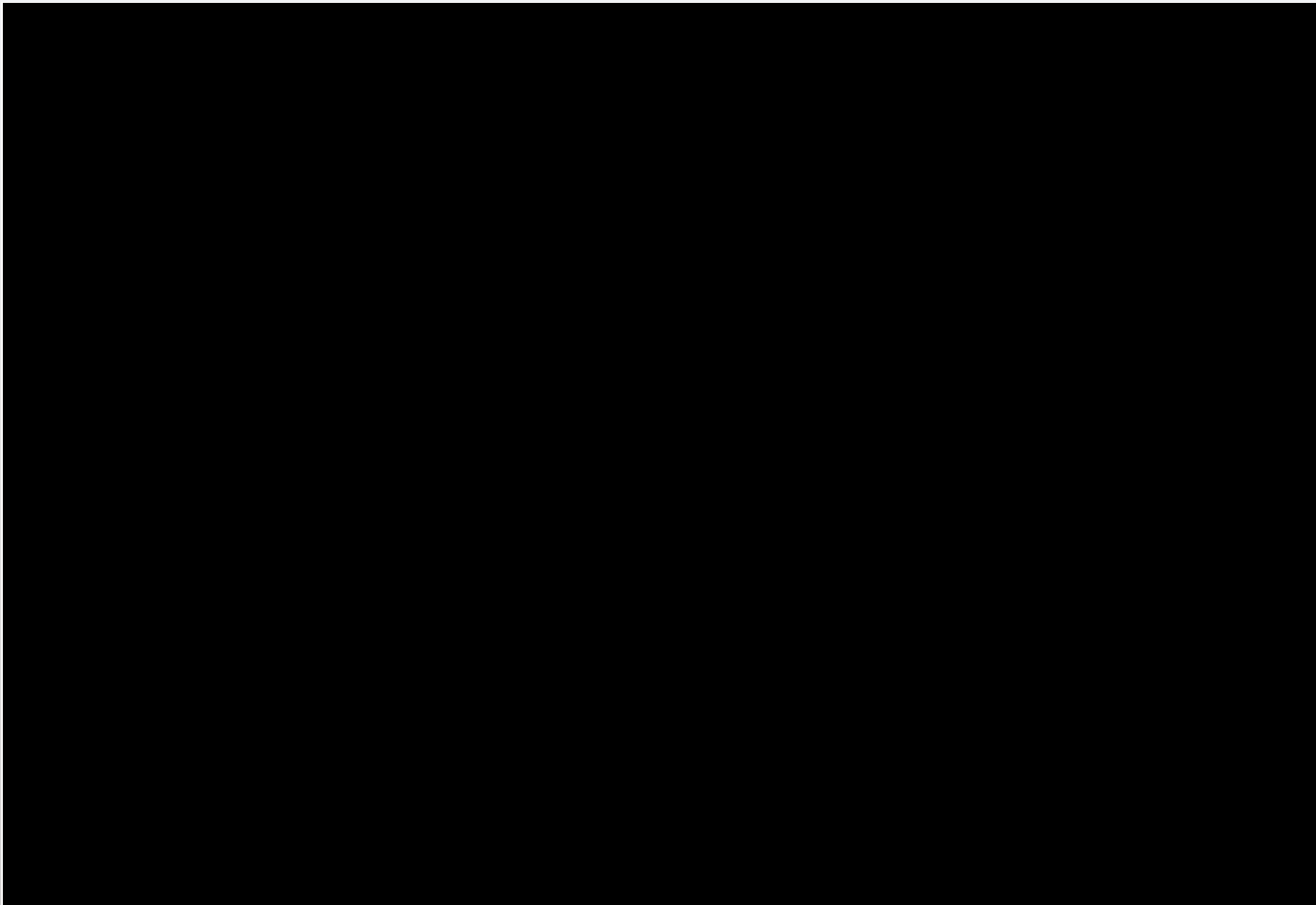


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## Moog's Non-CUI Trade Secret Identification: Trade Secret 8 (Excerpts)

(Storey Decl. Ex. D)



WeRide's most detailed identification contains less than two pages of narrative description before listing file names. Moog's detailed identifications contain much more detail, subcategories, and files specifically keyed to each category or subcategory.

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